

FACSIMILE TRANSMISSION

TO: C. Michael Pfister
FROM: The Legal Connection, Inc.
DATE: April 4, 2012

Re: C.A. NO. 3:11-CV-00651; JOHN DOE XX v. HOLY SEE (State of Vatican City), THE REDEMPTORISTS/NEW ORLEANS VICE PROVINCE, VERY REVEREND HARRY GRILE, C.S.R., HIS PREDECESSORS AND SUCCESSORS, AS PROVINCIAL SUPERIOR OF THE REDEMPTORISTS/DENVER PROVINCE, ROMAN CATHOLIC CHURCH OF DIOCESE OF BATON ROUGE, MOST REVEREND ROBERT W. MUENCH, HIS PREDECESSORS AND SUCCESSORS, AS BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF BATON ROUGE, CHRISTOPHER JOSEPH SPRINGER, AND FIREMAN'S FUND INSURANCE COMPANY

WAIVER OF NOTICE AND REQUEST FOR COPIES OF RECORDS

Our client, Felecia Y. Peavy, has commissioned THE LEGAL CONNECTION, INC. ("TLC") to obtain records on SEE ATTACHED EXHIBIT A HERETO from the following custodian(s) for use in the above referenced case. You will find a copy of the Notice of Intention to Take Deposition Upon Written Questions and said Questions attached thereto.

I DO AGREE TO WAIVE THE NOTICE PERIOD. I DO NOT AGREE TO WAIVE THE NOTICE PERIOD.

TLC would like to offer you this opportunity to obtain a copy of the documents received from the Custodian(s) of Record listed below. Please indicate what type of copies (Paper or Digital or Both) you would like BY MARKING "Y" for "YES" OR "N" for "NO" beside each location below:

PAPER DIGITAL

U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION (BUSINESS)

If you choose to obtain copies (whether in paper or digital format), the cost will involve a \$65 base fee, \$15 delivery fee, \$25 administrative fee, and \$.55/page for exhibits/scans. Paper copies will incur an additional \$20 binding fee. If you would like the documents on CD in addition to a paper copy, an additional fee of \$25 will be charged for each CD provided.

Yes, I want a CD of the records Yes, I want an email of the records
Digital copies of all the legals and records should be in the following format:
Digital copies should only be emailed to the following email address:

Photographs, videotapes, audiotapes, medical imaging exhibits, and CD duplications will incur additional charges.
Yes, I want copies of all medical imaging (x-rays, MRI's, etc.) Yes, I want copies of all audio/video tapes.
Yes, I want copies of all photographs in the following manner: Black/White, Color copies, or Photo reprints

THE LEGAL CONNECTION, INC. also offers direct billing to most insurance companies.
I agree that I and/or my firm will be responsible for payment of the copies of records ordered on this waiver. I acknowledge that invoices are due and payable within 30 days of receipt and that actions for collection of services are performable and payable in Travis County, Texas.

RETURN TO:
THE LEGAL CONNECTION, INC.
ATTN: Miranda Ruiz
5901 Old Fredericksburg Road, D101
Austin, TX 78749
Phone: 512.892.5700
Fax: 512.892.5703

AGREED BY:
C. Michael Pfister
DUPLASS, ZWAIN, BOURGEOIS, PFISTER & WEINSTOCK
Three Lakeway Center, Suite 2900
3838 N. Causeway Blvd.
Metairie, LA 70002
504.832.3700 Fax 504.837.1119
Attorney for Defendant

Date: February 1, 2012

NOTE: RETURN OF THIS FORM IS REQUIRED WITHIN FOURTEEN (14) DAYS TO PROCESS YOUR REQUEST. ANY CANCELLATION OF THE ABOVE MUST BE IN WRITING. IF THE RECORDS HAVE ALREADY BEEN COPIED AND FEES INCURRED, THEN BILLING WILL BE PRORATED ACCORDINGLY.

Order No. 2386

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA**

**JOHN DOE XX**

**VS.**

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: **CIVIL ACTION NO. C.A. NO. 3:11-CV-00651**  
:  
:  
: (If the action is pending in another district, state where:  
: Middle District of Louisiana)

**HOLY SEE (State of Vatican City), THE  
REDEMPТОRISTS/NEW ORLEANS VICE PROVINCE,  
VERY REVEREND HARRY GRILE, C.S.R., HIS  
PREDECESSORS AND SUCCESSORS, AS PROVINCIAL  
SUPERIOR OF THE REDEMPТОRISTS/DENVER  
PROVINCE, ROMAN CATHOLIC CHURCH OF DIOCESE  
OF BATON ROUGE, MOST REVEREND ROBERT W.  
MUENCH, HIS PREDECESSORS AND SUCCESSORS, AS  
BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE  
DIOCESE OF BATON ROUGE, CHRISTOPHER JOSEPH  
SPRINGER, AND FIREMAN'S FUND INSURANCE  
COMPANY**

**AMENDED NOTICE OF INTENTION  
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

To other party/parties by and through their attorney(s) of record: **C. Michael Pfister (DUPLASS, ZWAIN, BOURGEOIS, PFISTER & WEINSTOCK), Don M. Richard (KINNEY ELLINGHAUSEN RICHARD & DESHAZO) and V. Charlie Cusimano (HERBERT, SPENCER, CUSIMANO & FRY)**

You will please take notice that fourteen (14) days from the service of a copy hereof with attached questions, a deposition by written questions will be taken of Custodian of Records for:

**U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION (BUSINESS)  
3211 4th Street NE  
Washington, DC 20017-1194**

before a Notary Public for **THE LEGAL CONNECTION, INC.  
5901 Old Fredericksburg Road, D101  
Austin, TX 78749  
512.892.5700 Fax 512.892.5703**

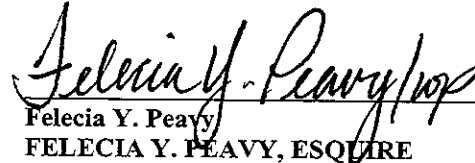
or its designated agent, which deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule 45, Federal Rules of Civil Procedure, to the officer taking this deposition to issue a subpoena duces tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, pertaining to:

**PLEASE SEE ATTACHED EXHIBIT "A" HERETO**

and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Order No. **2386**

Please further take notice that only the depositions of the designated Custodian of Records for the parties listed above will be Amended. Any other parties listed on prior Notices will continue as originally noticed.



Felecia Y. Peavy  
**FELECIA Y. PEAVY, ESQUIRE**  
The Esperson Buildings  
808 Travis, Suite 907  
Houston, Texas 77002  
713.222.0205 713.236.8547 Fax  
Attorney for Plaintiff  
SBA # 15698820

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been forwarded to all Counsel of Record by hand delivery, FAX, and/or certified mail, return receipt requested, on this day.

Dated: April 4, 2012

by 

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF LOUISIANA

JOHN DOE XX

VS.

HOLY SEE (State of Vatican City), THE  
REDEMPTORISTS/NEW ORLEANS VICE PROVINCE,  
VERY REVEREND HARRY GRILE, C.S.R., HIS  
PREDECESSORS AND SUCCESSORS, AS PROVINCIAL  
SUPERIOR OF THE REDEMPTORISTS/DENVER  
PROVINCE, ROMAN CATHOLIC CHURCH OF DIOCESE  
OF BATON ROUGE, MOST REVEREND ROBERT W.  
MUENCH, HIS PREDECESSORS AND SUCCESSORS, AS  
BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE  
DIOCESE OF BATON ROUGE, CHRISTOPHER JOSEPH  
SPRINGER, AND FIREMAN'S FUND INSURANCE  
COMPANY

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CIVIL ACTION NO. C.A. NO. 3:11-CV-00651

(If the action is pending in another district, state  
where: Middle District of Louisiana)

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION  
Records Pertaining To: PLEASE SEE ATTACHED EXHIBIT "A" HERETO  
Type of Records: BUSINESS RECORDS

1. Please state your full name.

Answer: \_\_\_\_\_

2. Please state by whom you are employed and the business address.

Answer: \_\_\_\_\_

3. What is the title of your position or job?

Answer: \_\_\_\_\_

4. Are these BUSINESS RECORDS, as outlined in the subpoena duces tecum, which were reported by and/or collected from Roman Catholic Diocese of Baton Rouge, in your custody or subject to your control, supervision or direction?

Answer: \_\_\_\_\_

5. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: \_\_\_\_\_

6. Please hand to the Officer taking this deposition copies of the **BUSINESS RECORDS** mentioned in Question No. 4. Have you complied? If not, why?

Answer: \_\_\_\_\_

7. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such **BUSINESS RECORDS**.

Answer: \_\_\_\_\_

8. Were these **BUSINESS RECORDS** kept in the regular course of business of the **U.S CONFERENCE OF CATHOLIC BISHOPS, SECRETARIAT OF CHILD AND YOUTH PROTECTION**?

Answer: \_\_\_\_\_

9. Was the method of preparation of these records trustworthy?

Answer: \_\_\_\_\_

\_\_\_\_\_  
WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_

**EXHIBIT "A"**

Any and all business records, including but not limited to: any type of correspondence or reports, whether in electronic form or reduced to writing, regarding allegations of abuse occurring in 1961 to 2002 and the costs in dealing with abuse allegations from 1961 to 2002, as reported by and/or collected from the Roman Catholic Diocese of Baton Rouge.